

FILED
11/1/2023

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23-CR-00587THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURTIN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

VERVIA WATTS

Case No.: 23 CR _____

Violation: Title 26, United States
Code, Section 7206(2)**INFORMATION**

The UNITED STATES charges:

COUNT ONE

On or about February 19, 2022, in the Northern District of Illinois and elsewhere, Defendant VERVIA WATTS willfully aided and assisted in, and procured, counseled, and advised the preparation and presentation to the Internal Revenue Service of a U.S. Individual Income Tax Return, Form 1040 for Client 1 for calendar year 2021, which was false and fraudulent as to a material matter. That tax return reported that Client 1 was entitled to a \$1,000 American Opportunity Credit for education expenses and a \$5,980 Earned Income Credit, whereas, as Defendant knew, Client 1 was not entitled to claim either tax credit.

In violation of Title 26, United States Code, Section 7206(2).



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